

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz & Schneid, PL 6409 Congress Avenue, Suite 100 Boca Raton, FL 33487 Telephone No.: 561-241-6901 Attorneys for Secured Creditor, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SAXON ASSET SECURITIES TRUST 2007-3, MORTGAGE LOAN ASSET BACKED CERTIFICATES, SERIES 2007-3 ALEISHA JENNINGS, ESQ.	CASE NO.: 17-22162-CMG CHAPTER 13 OBJECTION TO DEBTOR'S REQUEST FOR LOSS MITIGATION
In Re: DARLUSZ F. GOLCZEWSKI D/B/A PARADICE LANDSCAPE IRRIGATION, LLC Debtor.	

OBJECTION TO DEBTOR'S REQUEST FOR LOSS MITIGATION

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SAXON ASSET SECURITIES TRUST 2007-3, MORTGAGE LOAN ASSET BACKED CERTIFICATES, SERIES 2007-3 ("Secured Creditor"), by and through its undersigned counsel, Objects to Debtor's Request for Loss Mitigation (DE # 44), and states as follows:

1. Debtor, Dariusz F. Golczewski, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on June 14, 2017.
2. Secured Creditor holds a security interest in the Debtor's real property located at 541 Route 31, East Amwell Township, NJ 08551, by virtue of a Mortgage recorded on December 22, 2006 in Book 3095 at Page 871 of the Public Records of Hunterdon County, NJ. Said Mortgage secures a Note in the amount of \$530,400.00.
3. The Debtor filed Request for Loss Mitigation on May 22, 2018.
4. Secured Creditor objects to Debtor's request. Debtor's request states that Debtor will make adequate protection payments in the amount of \$1,860.00 during the loss mitigation process. ,Based on the express terms of the loss mitigation local rules, the proposed payments are calculated at 60% of the regular monthly principal and interest payment, plus 100% of any applicable escrowed amounts. However, an accurate calculation based on 60% of the regular monthly principal and interest payment, plus 100% of any applicable escrowed amounts, results in an adequate protection payment of \$2,448.58. Therefore, Secured Creditor objects to the proposed monthly adequate protection payments and any other payment below \$2,448.58, during the pendency of loss mitigation.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny Debtor's application for extension of the loss mitigation process, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz & Schneid, PL
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487
Telephone No.: 561-241-6901

By: /s/ Aleisha Jennings
Aleisha Jennings, Esq.

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz & Schneid, PL 6409 Congress Avenue, Suite 100 Boca Raton, FL 33487 Telephone No.: 561-241-6901 Attorneys for Secured Creditor, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SAXON ASSET SECURITIES TRUST 2007-3, MORTGAGE LOAN ASSET BACKED CERTIFICATES, SERIES 2007-3 ALEISHA JENNINGS, ESQ.	CASE NO.: 17-22162-CMG CHAPTER 13 OBJECTION TO DEBTOR'S REQUEST FOR LOSS MITIGATION
In Re: DARLUSZ F. GOLCZEWSKI D/B/A PARADICE LANDSCAPE IRRIGATION, LLC Debtor.	

CERTIFICATION OF SERVICE

I, Aleisha Jennings, represent DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SAXON ASSET SECURITIES TRUST 2007-3, MORTGAGE LOAN ASSET BACKED CERTIFICATES, SERIES 2007-3 in this matter.

1. On June 5, 2018, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: Objection to Request for Loss Mitigation
2. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

June 5, 2018

Robertson, Anschutz & Schneid, PL
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487
Telephone No.: 561-241-6901

By: /s/Aleisha Jennings
Aleisha Jennings, Esq.

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Joan Sirkis Warren Lavery & Sirkis 699 Washington St Suite 103 Hackettstown, NJ 07840	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Dariusz F Golczewski 541 Route 31 North Ringo, NJ 08551	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
Albert Russo CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)
U.S. Trustee. US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee.	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other <hr/> (as authorized by the court*)